

April 19, 2002

Mr. William F. Caton
Secretary
Federal Communications Commission
445 12th Street, S.W., TAW325
Washington, D.C. 20554

**FILED ELECTRONICALLY
VIA FCC ECFS**

Re: **Ex Parte Meeting – CC Docket No. 01-338: In the Matter of Review of
Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers**

Dear Mr. Caton:

On April 11, 2002, at the invitation of staff of the Wireline Competition Bureau, Cynthia Clugy and Martha Jenkins of Intrado Inc. (“Intrado”) met with Pamela Megna, Gail Cohen, Ben Childers, Daniel Shiman and Robert Tanner of the Wireline Competition Bureau to discuss issues related to the creation and maintenance of 9-1-1 databases. A true and correct copy of a written presentation used during the discussion is attached hereto as Exhibit A.

Intrado and Commission staff discussed how the Master Street Address Guide (MSAG) serves as the basis for the 9-1-1 database. The MSAG is created and maintained by Public Safety entities. Incumbent Local Exchange Carriers (ILECs) typically act as custodians of the MSAG and house it in database administration platforms on behalf of the Public Safety entities. When processed with telephone company subscriber records, the MSAG helps create the 9-1-1 databases used to route 9-1-1 calls and make pertinent subscriber data available to Public Safety Answering Points.

Intrado and Commission staff discussed whether the presence of Competitive Local Exchange Carriers (CLEC) records in the 9-1-1 database is an accurate indicator of competition in the local exchange market. Intrado explained that the 9-1-1 database is not a reliable measure of local competition. While residential subscriber line counts generally are represented accurately in the 9-1-1 database, business line counts are not. This discrepancy is due primarily to the nature of business service provisioning and the manner in which telephone numbers are presented for 9-1-1 database management.

Business line counts may be underrepresented in the 9-1-1 database if business service is provided via multi-line hunting arrangements. Such service arrangements associate multiple lines with a single translated telephone number. While that single translated telephone number may be reflected in the 9-1-1 database, the database typically will not reflect the many lines associated with that number, thereby understating the actual number of business lines in service.

Business line counts may be overstated as a result of the manner in which local exchange providers present telephone numbers to the 9-1-1 service provider for inclusion into the 9-1-1

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database. For example, Direct Inward Dial (DID) numbers associated with PBX or paging services may be provided to the 9-1-1 service provider for 9-1-1 database management; yet, such DIDs do not represent access lines. Because the 9-1-1 service provider typically is unaware of the manner in which local exchange providers present telephone numbers for inclusion in the 9-1-1 database, the 9-1-1 service provider does not know that every telephone number submitted for 9-1-1 database management corresponds to an actual access line.

Very truly yours,

/s/ Martha Jenkins

Martha Jenkins
Senior Director
Intrado Inc.
1225 I Street NW #500
Washington, DC 20005

Exhibit A

911 Database Creation

Cindy Clugy
Director External Affairs
Intrado

April 11, 2002





Master **Street Address** **Guide-MSAG**


Serves as basis for all Enhanced 9-1-1 services, both wireline and Wireless

Responsibility for creation and maintenance is on Public Safety, the 9-1-1 administrative agencies

A tabular listing of all known street address ranges in a 9-1-1 system.

These ranges are broken down by **Emergency Service Zones (ESZ)**, franchised telco boundaries, community names, city limits, central office boundaries, etc..

9-1-1 administrative entity is responsible for assigning **Emergency Service Numbers (ESN)** to tabular MSAG entries. The 9-1-1 administrative entity also supplies the name and telephone number of the emergency service providers in each ESZ. ESNs are administered by the telco serving as the 9-1-1 network provider and blocks are assigned to the 9-1-1 administrative entity for MSAG administration.



Master Street Address **MSAG**

- 9-1-1 Database Management Service provider, ILEC acts as custodian of the MSAG and houses it in database administration platforms on behalf of 9-1-1 entity. Recovers costs through tariffs billed to PSAP.
- Allows electronic access to MSAG for changes, additions, deletions
- Provides electronic copies on disk to CLECs on intervals specified in Interconnection Agreements.
- ILEC uses data to create SAG for local exchange provisioning

- Questions?

Service Order Input SOI

- Subscriber Listed Name
- Subscriber Listed or Service Address
- Subscriber Telephone Number
- Additional location information (apt, suite, trlr, etc....)
- Class of service
- Serving telephone company
- Pilot Telephone Number

Wireless and PBX SOI

- Wireless ESRK shell record
- Wireless ESRD ALI record
- PBX ELIN location record

Database Management for E911

